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November 9, 2023

**VIA ECF**

Honorable Claire C. Cecchi  
United States District Court  
District of New Jersey  
Marthin Luther King Bldg.  
& U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: *Bell et al., v. American Income Life Insurance Company, et al.*, No. 2:22-cv-06913; Joint Request for Extension of Mediation Stay**

Dear Judge Cecchi:

This firm represents Plaintiffs Atiya Bell and Abel Flores (“Plaintiffs”) in the above-captioned putative class action brought against Defendants American Income Life Insurance Company, Giglione-Ackerman Agency, LLC, Eric Giglione and David Ackerman (together, “Defendants”) for alleged unpaid overtime and minimum wages owed pursuant to the New Jersey Wage and Hour Law, N.J.S.A. § 34:11-56a et seq.

On July 17, 2023, the Court denied Defendants’ Motions to Compel Arbitration, without prejudice, and ordered “that the parties shall conduct limited discovery on the issue of arbitrability.” ECF No. 31 at p. 10. On July 21, 2023, the Court issued an Order referring this matter to mediation, ECF No. 32, which pursuant to L. Civ. R. 301.1(e)(6), stayed discovery for a period of 90 days. Since that time, the parties have engaged in productive discussions regarding settlement, as well as the exchange of information in aid of mediation.

A mediation session is currently scheduled with Mediator Sheryl M. Goski for November 22, 2023.

Together with counsel for Defendants, and Mediator Goski, the parties jointly request, pursuant to L. Civ. R. 301.1(e)(6), that the Court extend the mediation stay period through December 6, 2023.

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Counsel for all Defendants and Mediator Goski have reviewed and join this request. The parties thank Your Honor for your time and consideration with regard to this matter.

Sincerely,

/s/ Ryan P. McCarthy

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